

Joel S. Cohen, PC  
128 Mott Street, Suite 706  
New York, NY 10013  
Tel: 212-571-8899  
Fax: 212-608-0505  
Email: jcesq99@gmail.com

December 20, 2011

The Honorable Claire C. Cecchi  
United States District Judge  
Martin Luther King Building  
& U.S. Courthouse  
50 Walnut Street Room 4015  
Newark, NJ 07101

Re: United States v. Mou Chor Tung  
Docket No. 11 CR 517-CCC

Dear Judge Cecchi:

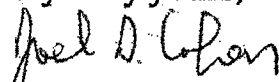
On December 12 Your Honor granted the Government's Rule 35(a) Motion and re-sentenced Mou Chor Tung to a term of 42 months probation. Mr. Tung met with his Probation Officer, USPO Monica Martin earlier today. Officer Martin advised him that generally probationers are not allowed to leave the state of New Jersey during their first 60 days of supervision. As the Court may recall my client has elderly parents that reside in Chinatown in Manhattan. He visits them at least once a week, and accompanies them to physicians and other appointments as neither of them speaks English. While on pre-trial release his bail limits permitted to visit them. His present inability to travel to Manhattan will create a substantial hardship for them.

I've spoken with USPO Martin regarding this matter; she has no objection to Mr. Tung being permitted to travel to New York but advised that it would require authorization by Your Honor. Prior to my conversation with her, in an abundance of caution, I also raised this issue with AUSA Aaron Mendelsohn. Mr. Mendelsohn graciously advised that the Government also has no objection to the granting of this request.

The Honorable Claire C. Cecchi  
United States District Judge  
Re: U.S. v. Mou Chor Tung  
Page two

I therefor respectfully request that you grant Mr. Tung's request to expand his travel limits during the first 60 days of probation supervision to include New York City by So Ordering this letter. Thank you.

Very truly yours,

  
Joel S. Cohen (JC6998)

cc: USPO Monica Martin  
AUSA Aaron Mendelsohn

The above application is hereby:

Granted: ✓ CCC Denies 21, 2011

Denied: \_\_\_\_\_

  
\_\_\_\_\_  
Claire C. Cecchi  
United States District Judge